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VOLCANO SHIPPING S.A.
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAS BULK TRANSPORT LTD.,
Plaintiff,
-against-
VOLCANO SHIPPING S.A.,
Defendant.

07 Civ. 7996 (DLC)

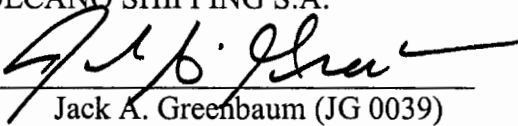
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Jack A. Greenbaum, dated October 28, 2007, Defendant's Memorandum of Law, and all prior pleadings and papers on file in this action, and pursuant to Rule E(7) of the Supplemental Rules for Certain Admiralty and Maritime Claims, Defendant Volcano Shipping S. A., will move before the Honorable Denise Cote on the 27th day of November, 2007 for an Order requiring Plaintiff Americas Bulk Transport Ltd. to provide countersecurity to Defendant equal in amount to the amount of Defendants' funds restrained by Plaintiff now and in the future.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6.1 of the Civil Rules of this Court, all opposing affidavits and answering memoranda shall be served on or before November 15, 2007.

Dated: New York, NY
October 28, 2007

Respectfully submitted,
BLANK ROME, LLP
Attorneys for Defendant/Counterclaim-Plaintiff
VOLCANO SHIPPING S.A.

By 
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